

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

LINDA DITOMASSO,	§	
	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION
	§	
PHILIP SERVICES CORPORATION,	§	NO. 05-40057
PSC GROUP LIFE PLAN and	§	
CONTINENTAL ASSURANCE COMPANY,	§	
	§	
Defendants.	§	

MOTION TO PERMIT COUNSEL TO APPEAR PRO HAC VICE

Pursuant to Rule 83.5.3(b) of the Local Rules of this Court, Jennifer M. Ryan, counsel of record for Defendants Philip Services Corporation and PSC Group Life Plan (collectively referred to herein as “Defendants”), hereby moves this Court to permit David M. Gregory to appear on Defendants’ behalf as counsel *pro hac vice* in the above-captioned case.

In support of this motion, the undersigned counsel states the following:

1. Jennifer M. Ryan is a member in good standing of the bar of this Court.
2. David M. Gregory is a member in good standing of the bar of the State of Texas, the U.S. District Courts for the Southern, Northern, and Eastern Districts of Texas, and the U.S. District Court for the District of Colorado.
3. Mr. Gregory is an associate in the law firm of Locke Liddell & Sapp LLP.
4. There are no disciplinary proceedings pending against Mr. Gregory as a member of the bar in any jurisdiction.
5. Mr. Gregory has been provided with the Local Rules of the United States District Court for the District of Massachusetts and has indicated in his Certificate (attached hereto) that he is familiar with them.

6. The Certificate of David M. Gregory in Support of this Motion to Permit Counsel to Appear *Pro Hac Vice* is attached hereto as Exhibit A.

Respectfully submitted,

**PHILIP SERVICES CORPORATION
and PSC GROUP LIFE PLAN**

By their attorneys:

/s/ Jennifer M. Ryan
Jennifer M. Ryan (BBO#(BBO# 661498)
James L. Hauser (BBO# 557214)
BROWN RUDNICK BERLACK ISRAELS LLP
One Financial Center
Boston, MA 02111
Tel. (617) 856-8200
Fax (617) 856-8201

Dated: July 1, 2005

LOCAL RULE 7.1(A)(2) CERTIFICATION

Counsel for Defendants attempted to confer with Plaintiff's Counsel William J. Ritter on July 1, 2005, prior to filing this motion but was unable to reach him.

/s/ Jennifer M. Ryan
Jennifer M. Ryan

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of July, 2005, a true and correct copy of the foregoing pleading was served via certified mail, return receipt requested, with proper postage affixed and addressed as follows:

William J. Ritter
POJANI HURLEY RITTER & SALVIDIO, LLP
446 Main Street
Worcester, MA 01608

/s/ Jennifer M. Ryan
Jennifer M. Ryan

IN THE UNITED STATES DISTRICT COURT FOR THE
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LINDA DITOMASSO,

Plaintiff,

v.

PHILIP SERVICES CORPORATION,
PSC GROUP LIFE PLAN and
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Defendants.

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CIVIL ACTION

NO. 05-40057

**CERTIFICATE OF DAVID M. GREGORY IN SUPPORT OF MOTION
TO PERMIT COUNSEL TO APPEAR PRO HAC VICE**

Pursuant to Rule 83.5.3(b) of the Local Rules of this Court and in support of the attached Motion to Permit Counsel to Appear *Pro Hac Vice*, I, David M. Gregory, having been duly sworn, on my oath do say as follows:


1. I am a member in good standing of the bar of the State of Texas, the U.S. District Courts for the Southern, Northern, and Eastern Districts of Texas, and the U.S. District Court for the District of Colorado.
2. I am an associate in the law firm of Locke Liddell & Sapp LLP.
3. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
4. I have been provided with the Local Rules of the United States District Court for the District of Massachusetts and I am familiar with them.



David M. Gregory

SWORN TO AND SUBSCRIBED before me this 30th day of June, 2005.





NOTARY PUBLIC IN AND FOR
THE STATE OF TEXAS

My Commission Expires: _____